

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

JASON COLEMAN and JESSICA  
CASEY, on behalf of the RVNB  
Holdings, Inc. Employee Stock  
Ownership Plan, and on behalf of a  
class of all other persons similarly  
situated,

Plaintiffs,

v.

Case No. 3:20-cv-01358-E

NEIL M. BROZEN, ROBERT  
PETERSON, JR., VASILIA  
PETERSON, MIKE PAXTON, NICK  
BOURAS, STERLING INVESTMENT  
PARTNERS III, L.P., NICOLE  
PETERSON 2012 IRREVOCABLE  
TRUST, and BROOKE PETERSON  
2012 IRREVOCABLE TRUST,

Defendants.

**MOTION FOR LEAVE TO EXCEED WORD LIMIT**

Plaintiffs Jason Coleman and Jessica Casey (“Plaintiffs”), on behalf of the RVNB Holdings, Inc. Employee Stock Ownership Plan, move for leave to exceed the word limit in *Plaintiffs’ Unopposed Motion and Incorporated Memorandum of Law for Preliminary Approval of Settlement and Certification of Settlement Class* (ECF No. 140). Defendants do not oppose this motion.

Paragraph II-A of the *Procedures for Cases Assigned to Judge Ada Brown & Standing Order* contains a limit of 6,250 words for any motion.

*Plaintiffs' Unopposed Motion and Incorporated Memorandum of Law for Preliminary Approval of Settlement and Certification of Settlement Class* contains 7,189 words. It is really two motions—one for preliminary approval of settlement, and one for certification of settlement class—combined into one motion. Because both motions relate to the proposed settlement of this action, Plaintiffs believe the Court should consider them together in one document. But to do so Plaintiffs need leave to exceed the word limit. Unfortunately, due to the complexity of the motion, Plaintiffs were unable to get the motion below the word limit.

Alternatively, Plaintiffs could separate the attached motion into two documents, neither of which would exceed the word limit. But because both motions would need to be considered together anyway, Plaintiffs believe this approach would be less efficient.

For these reasons, Plaintiffs respectfully request that the Court grant Plaintiffs leave to exceed the word limit in *Plaintiffs' Unopposed Motion and Incorporated Memorandum of Law for Preliminary Approval of Settlement and Certification of Settlement Class*.

Dated: January 9, 2025

Respectfully submitted,

By: /s/ John S. "Jack" Edwards, Jr.

John S. "Jack" Edwards, Jr.

Texas Bar No. 24040851

Thomas R. Ajamie

Texas Bar No. 00952400

**AJAMIE LLP**

Pennzoil Place - South Tower

711 Louisiana, Suite 2150

Houston, TX 77002

Tel: (713) 860-1600

Fax: (713) 860-1699

tajamie@ajamie.com

jedwards@ajamie.com

J. Douglas Uloth

Texas Bar No. 20273700

Of Counsel

**AJAMIE LLP**

5080 Spectrum Drive, Suite 1000 East

Addison, TX 75001-4648

Tel: (469) 791-0411

Fax: (888) 780-5946

douguloth@ulothlaw.com

Gregory Y. Porter (*pro hac vice*)

Ryan T. Jenny (*pro hac vice*)

James Kauffman (*pro hac vice*)

Alexandra Langley Serber (*pro hac vice*)

**BAILEY & GLASSER LLP**

1055 Thomas Jefferson St., NW,

Suite 540

Washington, DC 20007

Tel: (202) 463-2101

Fax: (202) 463-2103

gporter@baileyglasser.com

rjenny@baileyglasser.com  
jkauffman@baileyglasser.com  
aserber@baileyglasser.com

*Attorneys for Plaintiffs Jason  
Coleman & Jessica Casey*

**CERTIFICATE OF CONFERENCE**

On January 9, 2025, I personally discussed by email the relief requested in Plaintiffs' motion to for leave to exceed word limit with (1) Lindsay Camp, counsel for Defendants Robert Peterson, Jr., Vasilia Peterson, Mike Paxton, Nick Bouras, Sterling Investment Partners III, L.P., Nicole Petersen 2012 Irrevocable Trust, and Brooke Peterson 2012 Irrevocable Trust; and (2) Peter Allport, counsel for Defendant Neil Brozen. Both stated that the defendants in this case are not opposed to the relief sought in this motion.

/s/ John S. "Jack" Edwards, Jr.  
John S. "Jack" Edwards, Jr.

**CERTIFICATE OF SERVICE**

I certify that on January 9, 2025, a true and correct copy of the foregoing document was filed with the Clerk of Court using the CM/ECF system, which will send electronic notification of such filing to all counsel of record.

/s/ John S. "Jack" Edwards, Jr.  
John S. "Jack" Edwards, Jr.